

DRAFT FINDING OF NO SIGNIFICANT IMPACT (dFONSI) IDAHO ARMY NATIONAL GUARD PROPOSED SIMCO TRAINING AREA ELMORE COUNTY, IDAHO

1. Introduction

The Idaho Army National Guard (IDARNG) prepared an Environmental Assessment (EA) to identify and evaluate potential environmental effects from conducting military training (operations) and support activities on the proposed Simco Training Area. Activities include construction, operation, and maintenance and monitoring on 28,430 acres managed by the Bureau of Land Management (BLM), Bureau of Reclamation (BOR), and Idaho Department of Lands (IDL). The EA has been prepared in accordance with the National Environmental Policy Act (NEPA, 42 United States Code § 4321-4370e), Council on Environmental Quality Regulations for Implementing the Procedural Provisions of NEPA (CEQ Regulations, 40 *Code of Federal Regulations* [CFR] Parts 1500-1508), and *Environmental Analysis of Army Actions* (32 CFR Part 651).

The proposed Simco Training Area is located east of Simco Road in Elmore County, Idaho, adjacent to the Orchard Combat Training Center (OCTC). The proposed project area is located in southwestern Idaho, approximately 2 miles west of Mountain Home, Idaho, and 25 miles southeast of Boise, Idaho.

2. Description of Proposed Action and Alternatives

Proposed Action - The IDARNG requests from BLM a right-of-way (ROW) on 12,776 BLM acres, 555 acres of BOR- lands managed by BLM, and seeks from IDL a long-term lease on 15,097 acres of IDL-managed lands (28,430 total acres) to conduct military training activities (operations), construction activities, and maintenance/monitoring activities. Most of the site (20,919 acres or 74 percent) is found within the boundaries of the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA), with the residual 7,510 acres (26 percent) outside the NCA within the BLM's Four Rivers Field Office and on IDL lands. The lands outside the NCA are composed of 4,175 acres of IDL-managed lands and 3,335 acres of BLM-managed lands. There are no BOR-managed lands outside the NCA boundary. Training activities within the area would be managed under the BLM's 2008 NCA Resource Management Plan (RMP), the BLM's 1985 Kuna Management Framework Plan, the IDL's statewide management plan, IDARNG's Integrated Natural Resource Management Plan (INRMP), the statewide Integrated Cultural Resource Management Plan (ICRMP), and other regulatory and military requirements.

The type, timing, and management of military maneuver training activities conducted within the proposed project area would be the same as those currently conducted within the OCTC. These activities were assessed under the BLM's 2008 RMP/Environmental Impact Statement (EIS) and identified as a compatible use under the NCA enabling legislation in 1993. Annual training operations would occur from May 1 through October 31. Total annual training operations would be limited to six mechanized or armor companies annually, with Opfor and support vehicles. Each company could have up to 15 tracked vehicles including tanks and personnel carriers, with up to 350 soldiers. Each oppositional force would include 4 wheeled vehicles (modified High Mobility Multipurpose Wheeled Vehicles) with 16 soldiers. Support vehicles would vary based on the unit and training type, but the maximum support unit would include three wheeled and two-tracked vehicles with 10 soldiers. The soldiers, vehicles, and equipment that would use this

new area make up only 10 percent of the BLM-authorized level of use for the OCTC. Level of use was assessed under the 2020 BLM/National Guard Bureau (NGB) Real Property Master Plan EA. The total level of BLM-authorized use would not increase, rather, it would be redistributed over a larger area to increase training efficiency and reduce impacts to existing resources.

Annual training operations would include off-road maneuver training activities and engineering tasks conducted outside established off-limit areas. Engineering tasks would be limited to 5 acres of temporary disturbance on BLM-managed lands and 10 acres of temporary disturbance on IDL-managed lands annually.

There would be no live fire training operations of any kind within the proposed project area. Force-on-force operations would only use blank fire and a multiple-integrated-laser engagement system, or similar non-live fire systems for training purposes. Units operating in the area could remain overnight on one of three proposed assembly areas (20 acres each) to conduct multiday training events. Two of the three sites are located on BLM-managed lands (40 acres), and one is located on IDL-managed lands (20 acres).

To balance the proposed training activities with existing resources and uses, site improvements (design features) and management guidelines were developed through a collaborative process. These include the implementation of best management practices (BMPs), standard operating procedures (SOPs), and enhancement requirements for construction, operation, and maintenance activities; the installation of an improved crossing on Simco Road; enhancement of 26.1 miles of existing two-track road; and onsite infrastructure projects (gates, cattle guards, fences, irrigation lines, and Seibert stakes) (Table 1).

Table 1. Design Features for the Proposed Action, by Alternative:

Infrastructure	BLM	BOR	State	Total
Graveled Road Simco and Crow Rd (miles)	12.6	0.7	12.8	26.1
New Fence – Alternative A (linear feet)	5,690	0	15,536	21,226
New Fence – Alternative B (linear feet)	15,450	0	15,536	30,986
Fence Removed (linear feet)	34,068	0	40,423	74,491
Replacement of Waterlines (linear feet)	0	0	93,763	93,763
Cattle Guards (two/site)	21	0	9	28^a
Access Gates (30-foot)	1	0	1	2
Assembly Areas (20 acres each)	40	0	20	60
Off-limit Areas (acres)	964	316	760	2,040
Off-limits Areas Fenced – Alternative A (acres)	0	0	0	0
Off-limits Areas Fenced – Alternative B (acres)	43	0	0	43
Engineering/Digging (acres) ^b	5	0	10	15

^a Of the 28 crossings, 2 fall on a fence between BLM-managed lands and IDL-managed lands.

^b Engineering/digging exercises will occur annually.

The **purpose** of the Proposed Action is to offset the loss of available maneuver training lands within the OCTC, and to obtain a sufficient amount of accessible maneuver training lands to

support the mission of the IDARNG and DoD, increase training efficiency, limit user conflicts with the public, comply with the NCA legislation, and to prepare for and ensure troop combat readiness and safety. The BLM's 2008 NCA RMP management guidelines required that military maneuver activities within the OCTC be restricted to areas with less than 10 percent shrub cover. As a result, the amount of available and useable military maneuver training lands within the OCTC boundary was reduced from approximately 89,000 acres to approximately 35,000 acres, a reduction of roughly 54,000 acres (61 percent) of the historically available area. As such, the amount of available and effective maneuver training lands within the current OCTC boundary is insufficient to meet the training requirements and associated timelines the IDARNG and DoD require. Increased use of the area by the public for recreational activities has also resulted in greater user conflicts, concerns related to the health and safety of training soldiers and the public, and diminished training capacity of the OCTC and IDARNG.

The Proposed Action is **needed** to obtain a sufficient amount of accessible maneuver training lands to meet the current IDARNG mission and DoD training requirements outlined in Field Manual (FM) 3-96 *Brigade Combat Team* and Training Circular (TC) 25-1, *Training Land* and to prepare for and ensure troop combat readiness and safety. (While virtual simulators are used to support training activities, on-the-ground training activities over realistic distances are essential in simulating combat conditions that soldiers and their units will face when deployed in combat conditions and in harm's way.)

The Simco Training Area is also **needed** for the following:

- Allow the Brigade Combat Teams (BCTs) to complete an Exportable Combat Training Capability (xCTC) program within 30 days to better prepare for Large-Scale Combat Operations (LSCO) and Mission Essential Task List (METL) proficiency.
- Comply with DoD Instruction Number 1215.06, (*Uniform Reserve, Training, and Retirement Categories for the Reserve Components*) which limits National Guard annual training for soldiers to 30 days each fiscal year, thereby reducing National Guard BCTs from achieving METL proficiency.
- Comply with National Guard Regulation (NGR) 350-1, (*Army National Guard Training*) which encourages all elements of a unit to train together whenever possible. Current available maneuver training lands within the OCTC do not allow for a full BCT to complete an Exportable Combat Training Capability (xCTC) and other mandated collective training within 30 days.
- Provide the capability for LSCO and training over realistic distances, all of which contribute to the overall strategic readiness of the force.
- Meet IDARNG mission and DoD training requirements outlined in FM 3-96, TC 25-1, DoD Instruction Number 1215.06, and NGR 350-1, and to prepare for and ensure troop combat readiness and safety (refer to the aforementioned IDARNG and DoD mission requirements).
- Offset the growing use of the OCTC by the public and associated increases in training conflicts that have resulted in greater concerns for the health and safety of training soldiers and the public.
- Support sustainable training practices by dispersing military training activities over a greater area and allowing for rest and rotation of areas affected (that is, allowing vegetative regeneration and recovery in areas affected) in order to comply with the NCA legislation.

Alternatives Considered - Based on the purpose and need of the IDARNG as previously outlined, and existing management guidelines for military training within the OCTC, there are no viable alternatives identified for only training on the OCTC itself, so the IDARNG determined that training lands outside the existing OCTC boundary were needed. Based on the land ownership and parcel configuration in the region, there were five potential options for external training lands in the area: private, BLM/BOR, IDL, a combination of private and BLM/BOR or IDL, and a combination of BLM/BOR and IDL. There are no other land ownerships of sufficient size to be a viable alternative. To address the identified purpose and need in a manner that is logistically and economically feasible, the IDARNG and NGB developed six siting criteria:

1. The proposed project area must be located directly adjacent to, or in proximity to, the existing training lands of the OCTC.
2. The proposed project area had to be of sufficient size (25,000 acres) and configuration to sustainably meet DoD maneuver training requirements as defined under FM 3-96 and TC 25-1.
3. The proposed project area had to be of sufficient size (25,000 acres) and configuration to sustainably support the completion of an xCTC for a full BCT within 30 days.
4. The proposed project area had to be of sufficient size (25,000 acres) and configuration to sustainably conduct LSCO to meet METL proficiency.
5. The proposed training lands had to be easily accessible for military equipment (tracked and wheeled) and allow for required military training operations with limited restrictions and limited conflicts with public users.
6. The acquisition of proposed training lands had to be economically feasible and allow for a long-term use agreement in excess of 20 years.

In addition to the siting criteria, each real estate option was reviewed and assessed based on a set of defined parameters used to identify whether an alternative was reasonable. These assessment parameters included proximity to the OCTC, size, configuration, use agreement and economic feasibility, restrictions and limitations, and public use conflicts.

Based on the defined siting criteria and assessment process, there was only one real estate option (combination of BLM/BOR-managed lands and IDL-managed lands) that fully met the IDARNG/DoD purpose, need, and assessment criteria. In addition to siting, design features and management options for training operations and access to the site were developed to identify a range of alternatives, including the No Action Alternative.

The proposed training site, type and duration of activities, BMPs and SOPs, and training support activities currently implemented for the OCTC would be consistent across all alternatives, not including the No Action Alternative. To support training activities in a sustainable manner, the IDARNG would coordinate with BLM and IDL staff to actively manage natural resources, cultural resources, and wildland fire in the area. The IDARNG would also provide increased resources (funding, staff, equipment, and infrastructure) for monitoring and protection of natural and cultural resources, active enhancement and restoration of habitat, control of invasive and noxious weeds, and wildland fire suppression and rehabilitation. As with the OCTC, active management of these resources is required under Army Regulation (AR) 350-19, AR 200-1, and the IDARNG's INRMP, statewide ICRMP, and associated resource management documents.

Site-specific design features and management actions that would be consistent across both alternatives, not including the No Action Alternative, would include the following:

- All existing training support activities the IDARNG has currently implemented would be implemented at the proposed project area
- Designation of 2,040 acres of residual shrub habitat as off limits (no training activities permitted)
- Construction and maintenance of a single improved crossing site on Simco Road
- Enhancement and maintenance of 137,808 linear feet (26.1 miles) of existing two-track road
- Removal of 74,500 linear feet (14.1 miles) of four-strand barbed wire fence
- Replacement of 93,760 linear feet (17.8 miles) of buried water lines (all on state lands)
- Replacement of two tension gates with 30-foot metal access gates
- Construction and maintenance of three hardened assembly areas (60 acres)
- Construction of up to 28 cattle guards or metal gates (20 feet each)
- Authorization of up to 15 acres (5 acres on BLM-managed land and 10 acres on IDL-managed land) for engineering or digging

Table 2 summarizes site-specific design features and management actions that would vary across alternatives, including the No Action Alternative. These site-specific design features are used to develop a full range of alternatives that meet the purpose and need of the IDARNG/DoD and BLM.

Table 1. Summary of Proposed Action and Alternative Design Features

Alternative	Specific Design Features
No Action	No military training activities within the proposed project area. Existing land uses (livestock grazing, public access, and recreation) would continue at their current levels.
Alternative A	Proposed Training Activities, Infrastructure, and Support (Alternatives A and B) Off-limit areas associated with the cultural protection plan would not be fenced. Total of new fence within the proposed project area would be 21,226 linear feet (4.0 miles). Engineering exercises (5-acre dig site) on BLM-managed land would have undefined boundaries (located throughout the area as needed, but not to exceed 5 acres total annually). Maximum 30 days of restricted access to BLM-managed lands would be provided within the proposed training area during training activities. Permanently locked gates on the eastern and western sides of the Simco Road access point.
Alternative B	Proposed Training Activities, Infrastructure, and Support (Alternatives A and B) Off-limit areas associated with the cultural protection plan would be fenced with an additional 20,270 linear feet (3.8 miles of new fence). Total new fence within the proposed project area would be 30,986 linear feet (5.9 miles). There would be up to 5-acre fixed dig sites each year on BLM-managed lands. There would be no public restrictions on BLM-managed lands. There would be no gate lock at the Simco Road access point.

3. Environmental Analysis

Based on the IDARNG's environmental analysis, it has been determined that conducting military training and support activities on the proposed Simco Training Area in Elmore County, Idaho would have less than significant adverse impacts, individually or cumulatively, on the quality of the human or natural environment.

Implementation of the Proposed Action would be expected to result in less than significant, short-term adverse impacts on livestock grazing, military training, public access and recreation, air quality, climate change, noise, soils, vegetation resources, wildlife resources, wildland fire, home values, public-military interactions, infrastructure and transportation, and hazardous and toxic waste. Implementation of the Proposed Action has the potential to create less than significant, long-term adverse impacts on livestock grazing, public access and recreation, air quality, climate change, noise, vegetation resources, wildlife resources, wildland fire, home values, public-military interactions, infrastructure and transportation, and hazardous and toxic materials and waste. The Proposed Action also has the potential for short-term, localized beneficial impacts to livestock grazing and soils due to enhanced infrastructure. The addition of operational lands would be a long-term beneficial impact to military training, socioeconomics, and reduced public-military interactions. Operational activities would provide a long-term beneficial impact to soils, vegetation and wildlife, including special-status species. Less than significant short- and long-term beneficial impacts to wildland fire would occur due to enhanced infrastructure and access. Less than significant long-term beneficial impacts to cultural resources will result from implementation of the ICRMP and Cultural Protection Plan. The Proposed Action would have no measurable impacts or material bearing on paleontological resources, water resources, aesthetics and visual resources, airspace, utilities, communications, and solid waste. Impacts would be managed through the implementation of proposed BMPs and SOPs. The Proposed Action would not disproportionately affect populations protected under Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*.

4. Mitigation/Enhancement

Based on the impacts from the Proposed Action outlined in Alternatives A and B, coupled with the proposed design features, management actions, and implemented BMP/SOPs outlined in Appendix G of the EA, the Proposed Action (Alternatives A and B) would not exceed the significance threshold of the resources and uses considered. As such, there would be no mitigation actions required to reduce the level of significance for any resource or use assessed, such as a mitigated Finding of No Significant Impact.

However, as part of the BLM's ROW authorization process, enabling legislation, and the 2020 MOU (Appendix B of the EA), the IDARNG is required to mitigate the impacts of all authorized ROWs within the NCA; that is, the authorized ROW must have a net enhancement on the natural and cultural resources of the NCA. This requirement is defined under the Public Law (PL) 103-64 and the 2020 BLM/Idaho Military Division MOU (Appendix B). To address this BLM requirement, the IDARNG and BLM have developed a standardized method to quantitatively assess the amount of mitigation required at a designated site to enhance the NCA for issuance of a ROW (Appendix G).

Based on this standardized process, the IDARNG must enhance the structural and/or functional components of a designated site (within or directly adjacent to the NCA) to a specified level, as defined by the BLM and IDARNG. As a model based-approach, it is assumed that enhancement would be successful over time, resulting in a positive net enhancement score for the NCA (that is, greater than a 1:1 ratio) (Appendix G). In the event enhancement methods are not successful, or

there is not an established trend toward success over time, the BLM and IDARNG, through an adaptive process, shall adjust the methods. These alternative methods could include increased restoration/rehabilitation rates, additional funding requirements, or the limitation or restriction of the IDARNG's authorized use within the authorized ROW.

Regulations

The Proposed Action will not violate NEPA, the CEQ Regulations, 32 CFR 651, or any other federal, state, or local environmental regulations.

5. Commitment to Implementation

The NGB and IDARNG affirm their commitment to implement this EA in accordance with NEPA. Implementation is dependent on funding. The IDARNG and the NGB's Installations and Environment Directorate (ARNG-G9) will ensure that adequate funds are requested in future years' budgets to achieve the goals and objectives set forth in the EA.

6. Public Review and Comment

In addition to the public involvement associated with the Proposed Action (**Section 1.4.1** of the EA), public scoping was conducted for a similar proposed action in the area in 2018. Because the 2018 proposed action and location are similar in scope to this Proposed Action, all comments received were incorporated into this public scoping process and summarized in Attachment I.

A project summary letter and invitation to a virtual open house were mailed to interested parties on March 2, 2021. In addition, a nationwide public notice, via social media, was issued by the BLM on March 5, 2021, and the IDARNG on March 8, 2021. Information about the project, scoping process, and timeline were included in all correspondence, including links to the IDARNG's Documents for Review (<https://emomil.imd.idaho.gov/>) website and BLM website (<https://go.usa.gov/xsBJZ>).

The IDARNG, in coordination with the BLM, also conducted two virtual public scoping meetings on March 17, 2021, from 2:00 PM to 3:00 PM and from 6:00 PM to 7:00 PM. Public comments were generally in line with those received in 2018. Concerns were raised about the project's effect on the following resource areas: wildlife, noise, toxins, fugitive dust, nonnative-native weeds, wildland fire, airspace, military training, economics, public lands, BLM ROW, infrastructure, transportation, special-status species, water quality, air quality, climate change, visuals, soil erosion, and public access. Additional proposed alternatives were also identified in the comments and incorporated into the Proposed Action.

There was coordination with the appropriate Tribal, federal, state, and local agencies throughout the EA development process, and agency comments were incorporated into the analysis of potential environmental impacts performed as part of the EA. Comments were received in 2018 and 2021. Attachment I includes a summary of only the 2021 comments, as there were no differences in overall comments (in other words, the resources and issues identified). During the 2021 public scoping period, 41 separate comments were received. Attachment I includes a summary of all 2021 comments and the IDARNG's responses.

The final EA and draft Finding of No Significant Impact were made available for public review and comment from 8 April 2022 through 9 May 2022 at the locations listed in the final EA's public notice of availability published in the *Idaho Statesman* and the *Mountain Home News* on 10 April 2022 and 13 April 2022, respectively. The BLM and IDARNG also hosted a virtual

public meeting via Zoom on 21 April 2022 to summarize the proposed action and alternatives (including those that were not carried forward for assessment), identify how to access and download copies of the final EA and draft FONSI, and outline the process and time line to submit comments. [TBD #] comments were received, and information was incorporated into the analysis, as appropriate. A summary of all [TBD#] written comments and the IDARNG's responses are included in Attachment II.

7. Finding of No Significant Impact

After careful review of the EA, I have concluded that implementation of the Proposed Action would not generate significant controversy or have a significant impact on the quality of the human or natural environment. This analysis fulfills the requirements of NEPA and the CEQ Regulations. An EIS will not be prepared, and the NGB is issuing this Finding of No Significant Impact.

Date

Anthony Hammett

Colonel, U.S. Army

Chief, G-9 Army National Guard

Attachments

- I. Summary of 2021 Public Scoping Comments and IDARNG Responses
- II. Summary of Final Environmental Assessment Public Comments and IDARNG Responses

Attachment I

SUMMARY OF 2021 PUBLIC SCOPING COMMENTS AND IDARNG RESPONSES

ENVIRONMENTAL ASSESSMENT PREPARED FOR THE PROPOSED SIMCO TRAINING AREA, ELMORE COUNTY, IDAHO

Commenter	Category	Comment	IDARNG Response and Comment
Office of Species Conservation	<i>Lepidium Papilliferum</i> (Slickspot Peppergrass)	Primary threat to <i>Lepidium Papilliferum</i> (Slickspot Peppergrass) is wildfire and invasive nonnative plant species, among others.	These will be addressed through IDARNG fire management activities, active sagebrush and forb habitat restoration, invasive and nonnative vegetation treatment, and annual census and monitoring surveys to benefit slickspot peppergrass.
Idaho Fish and Game (IDFG)	Biological Resources	IDFG therefore recommends that the EA comprehensively analyze potential adverse effects and corresponding mitigation options for the following resources: <ul style="list-style-type: none">• Big game, including pronghorn.• Small mammals, including pygmy rabbits.• Bats.• Migratory birds including raptors.• Reptiles.• Slickspot peppergrass, including the Crater Rings Elemental Occurrence area.	These will be addressed in the biological resources section of the document.
Woolston, Joe	Public Access	Restricting Public Access	Under Alternative A, public access could be excluded for up to 30 days annually. Under Alternative B, there would be no public exclusion.
Woolston, Joe	Water	Impacting the water table in the area	There are no proposed actions affecting the water table.
Woolston, Joe	Noise	Noise impacts from training activities	This is fully assessed in the document.
Woolston, Joe	Transportation	Convoy impacts to local roads	Training-related impacts to public roads would be limited to Simco Crossing.
Tactical Bacon	Military Training	In support of the proposed action	Impacts to military training are outlined in the document.

Commenter	Category	Comment	IDARNG Response and Comment
Strough, Caleb	Military Training	Additional training lands are not needed.	Impacts to military training are outlined in the document.
Strough, Caleb	Big Game Habitat	Critical big game habitat and species impacts	Impacts to wildlife, including special-status species, are outlined in the document.
Steenholf, Karen	Golden Eagles and Raptors	Proximity of the proposed action to existing golden eagle Ferruginous Hawks	Impacts to wildlife, including golden eagles and other raptors, is outlined in the document.
Spotts, Richard	Military Training in the NCA	Proper legal authority of the BLM to expand of military training in an area designated as an NCA. Loss of 2/3 of the NCA to invasive plants and wildfire.	Military training is not being introduced to the NCA. Training has occurred in the area since the 1940s. The BLM does have the legal authority to designate ROWs under the Federal Land Policy and Management Act of 1976. Military training is specifically called out in the 1993 designation (Public Law 103-64) as a compatible and allowable use within the NCA, and it conforms to the 2008 NCA resource management plan.
Munther, Greg	Vegetation and Invasive and Noxious Weeds	Impacts to sagebrush and establishment and spread of invasive species	Impacts on these resources will be fully analyzed in the document.
Munther, Greg	Soils including Biological Crusts	Impacts to wet soils and biological crusts	As stated, military training activities have self-imposed soil saturation requirements (no off-road maneuver training if soils are saturated). This is for soil protection and impacts to equipment. Impacts on these resources will be fully analyzed in the document.
Munther, Greg	Wildlife	Disturbance to wildlife species	Impacts on these resources will be fully analyzed in the document.
Munther, Greg	Public Access	Displaced public access	Under Alternative A, public access could be excluded for up to 30 days annually. Under Alternative B, there would be no public exclusion.
Munther, Greg	Roads	New roads will bring in more public use	Impacts on these resources will be fully analyzed in the document.
Munther, Greg	Alternatives	Proposed Alternatives: <ul style="list-style-type: none"> Conduct these operations on an existing military base 	These proposed alternatives are addressed in the document. Mr. Munther was added to the interested party list.

Commenter	Category	Comment	IDARNG Response and Comment
		<ul style="list-style-type: none"> Lease or buy 38,000 acres of private land as a tank playground Address why tank operators in other National Guard Units do not require such public land for training 	
M&3Gs	Lands and Military	I oppose this type of maneuver on public lands due to destruction of the land and habitat and the change in warfare that will rely less on tanks in the future.	Impacts to lands and habitat are addressed in the document. Change in warfare tactics is beyond the scope of this action and will not be addressed.
Lewis, Courtney	Mountain Home Air Force Base	Impacting operations at the MHAFB	The IDARNG is in constant coordination with MHAFB. As a stakeholder, the MHAFB was included in the development of the proposed action and a mutual agreement MOU for small arms training has been developed. (Not related to proposed Simco Training Area.)
Lewis, Courtney	Communication and Noise	Notification of training exercises	The OCTC has a communication structure in place to receive any and all training-related complaints. The OCTC averages about 5 complaints annually. A training notification is sent out to those residents within the defined impact area per the OCTC Statewide Noise Plan. It is not logistically feasible to notify all residents in Elmore County for all training exercises.
Lakeman, Robert	Wildland Fire	Impacts from wildfire on local residents	Impacts on these resources will be fully analyzed in the document.
Lakeman, Robert	Local Fire Districts	No existing fire districts	The IDARNG cannot provide direct support as a fire district. However, the IDARNG is working with Elmore County to look to this from an administrative perspective that is not tied to this action.
Kochert, Michael	Golden Eagles and Raptors	Proximity of the proposed action to existing golden eagle Ferruginous Hawks	Impacts to wildlife, including golden eagles and other raptors, is outlined in the document.
Humm, Peter	Military Training	Potential impacts to soldiers and their safety if inadequately trained, or with insufficient training lands.	Impacts on these resources will be fully analyzed in the document.
Henderson, Danny	Proposed Action	In support of proposed action.	Comment has been recorded.
Hanson, Thomas	Noise	Noise impacts form training activities	This is fully assessed in the document.

Commenter	Category	Comment	IDARNG Response and Comment
Hanson, Thomas	Water	Impacting the water table in the area	There are no proposed actions affecting the water table.
Hanson, Thomas	Wildland Fire	Impacts from wildfire on local residents	Impacts on these resources will be fully analyzed in the document.
Hanson, Thomas	Wildlife and Livestock	Disturbance to wildlife species and livestock	Impacts on these resources will be fully analyzed in the document.
Fite, Katie	All	See 2018 Comments Matrix	See 2018 Comments Matrix. Impacts on these resources will be fully analyzed in the document. (EA Appendix D, Public Scoping Documentation)
Idaho Conservation League	Public Access and Illegal Activities	Illegal activities are a cause for the need to expand training. Design features to control illegal activities need to be included.	The BLM and IDARNG cannot develop an alternative with the assumption that illegal activities would take place. However, design features will be included to monitor impacts from public use, and illegal activities will continue to be managed by BLM and IDARNG on IDL-managed lands.
Idaho Conservation League	ROW	Is a ROW the best mechanism to authorize this activity and provide necessary safeguards for the NCA.	The BLM has identified through the application process that the ROW, as opposed to a lease agreement, is the best and most responsive way to administer use of the area by the IDARNG.
Idaho Conservation League	Alternatives	Additional alternatives proposed: <ul style="list-style-type: none"> • No BLM lands include in the training area, i.e. only State Lands with a BLM ROW. • Design features to limit illegal activities • Seasonal Limitations 	These alternatives will be reviewed and included in the alternatives section and assessed fully or identified as an alternative considered but not assessed with justification.
Idaho Conservation League	EIS vs. EA	Proposal warrants an EIS	An EA is being completed to see if there are any issues that meet the criteria of "significant." If the EA shows that there would be significant impacts to the human environment, then an EIS would have to be prepared. If not, then a Finding of No Significant Impact (FONSI) would be signed.
Idaho Conservation League	Rotate Training Areas	Incorporate training rotations (2 seasons)	This has been identified as a design feature and will be incorporated into the analysis.

Commenter	Category	Comment	IDARNG Response and Comment
Idaho Conservation League	Mitigation/ Monitoring	Increased onsite mitigation, PSAs, volunteers for seed collection and planting efforts.	Increased resources by the IDARNG are included in the proposed action. The effects of these resources (including funding, monitoring, equipment, restoration, fire suppression) will be assessed.
Idaho Conservation League	Fire Response	Impacts from wildfire on local residents	Impacts on these resources will be fully analyzed in the document.
Debolt, Ann	Climate Change/Dust Abatement	Dust abatement on existing lands and impacts from climate change	Impacts on these resources will be fully analyzed in the document.
Debolt, Ann	Alternatives	Additional alternatives: <ul style="list-style-type: none"> • Increased efficiency of existing lands • Increased use of simulators • Reduced public “intrusion” on existing training lands 	These alternatives will be reviewed and included in the alternatives section. They will be assessed fully or identified as an alternative considered but not assessed with justification.
Debolt, Ann	EIS vs. EA	Proposal warrants an EIS	IDARNG is completing an EA to see if there are any issues that meet the criteria of “significant.” If the EA shows that there would be significant impacts to the human environment, then an EIS would have to be prepared. If not, then a FONSI would be signed.
Debolt, Ann	Golden Eagles and Raptors	Proximity of the proposed action to existing golden eagle and impacts to other raptors and migratory birds	Impacts to wildlife, including golden eagles and other raptors and migratory birds, is outlined in the document.

Attachment II

**SUMMARY OF FINAL ENVIRONMENTAL ASSESSMENT PUBLIC COMMENTS AND
IDARNG RESPONSES**

**ENVIRONMENTAL ASSESSMENT PREPARED FOR THE PROPOSED SIMCO TRAINING
AREA, ELMORE COUNTY, IDAHO**

To be completed following public review of the fEA and dFONSI